

EXHIBIT C

From: [Desai, Ishika](#)
To: ["Beckerman, Brian L."; Padro, John P](#)
Cc: [Keegan, Timothy](#); [DG-GP-SAFE-SSC](#); [Taber, Kenneth W.](#); [Madigan, Sarah M.](#); [Goldman, Jessica](#)
Subject: RE: SecurityScorecard, Inc. v. Safe Securities, Inc., Case No. 1:24-cv-04240-ER
Date: Friday, August 23, 2024 12:14:00 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[Proposed Scheduling Order - PWSP DRAFT 8-20-24 GP Edits.docx](#)

Brian,

Thank you for circulating a draft of the proposed Scheduling Order. We have moved the content into a Word document for ease of editing. The attached also includes SAFE's proposed edits, highlighted in yellow.

Most revisions are self-explanatory, but there are a few points we wanted to comment on:

1. As to the substantial completion of document productions in response to the First Set of RFPs, this deadline will need to be mutual. Moreover, we cannot agree to such a short date for substantial document production without knowing what the scope of SSC's amended document requests will include, and we also anticipate 30 days from responses will be insufficient to meet all document requests. Given this, we would propose that the parties agree on a scope of documents that will be produced by SAFE and SSC by October 25, 2024 on an RFP basis, which will allow the parties continue to meet-and-confer on the remaining scope of the requests (as suggested by Mr. Taber during the August 13 hearing). To that end, we suggest that on Monday, the parties identify no more than 10 RFPs to initially prioritize the collection and production in response to. The parties can then confer and reach agreement on the list of prioritized RFPs and address any preliminary concerns, including those related to scope and timeframes for production.
2. We continue to disagree as to the appropriate scope of discovery. As we discussed, the issues and claims tied to Ms. Polyakova cannot be separated and it would be improper to continue on these now, especially given the lack of any basis for claims against SAFE. However, we might consider a narrowed focus for discovery on these issues to help SSC assess the lack of merit of these claims – for example, documents and communications related to the employment and onboarding of Ms. Polyakova, and to the extent permitted by Ms. Polyakova, forensic images of the Lists on Ms. Polyakova's personal and SAFE computers up to any sequestering. Again, we are happy to discuss further aspects of this, but SAFE's current position remains that discovery on these issues is improper and the claims related to her conduct should be stayed and/or collectively tried with Ms. Polyakova.

Thank you,

Ishika

Ishika Desai

she/her/hers

Associate



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From: Beckerman, Brian L. <brian.beckerman@pillsburylaw.com>
Sent: Thursday, August 22, 2024 12:18 PM
To: Padro, John P <JPadro@goodwinlaw.com>
Cc: Keegan, Timothy <TKeegan@goodwinlaw.com>; DG-GP-SAFE-SSC <DG-GP-SAFE-SSC@goodwinlaw.com>; Taber, Kenneth W. <kenneth.taber@pillsburylaw.com>; Madigan, Sarah M. <sarah.madigan@pillsburylaw.com>; Goldman, Jessica <jessica.goldman@pillsburylaw.com>
Subject: RE: SecurityScorecard, Inc. v. Safe Securities, Inc., Case No. 1:24-cv-04240-ER

EXTERNAL

John and Tim,

In anticipation of the status update due to Judge Ramos tomorrow, we wanted to follow up with you regarding (i) your comments to our proposed Scheduling Order we sent you this past Tuesday, and (ii) now that you've received the digital footprints and other materials Starlit downloaded from SSC's customer platform, your proposed revisions to our Proposed Order (Dkt. 98) regarding remediation of SAFE's products and offerings reflecting or utilizing Confidential Information obtained from SSC's customer platform.

Best,
Brian

From: Beckerman, Brian L. <brian.beckerman@pillsburylaw.com>
Sent: Tuesday, August 20, 2024 7:58 AM
To: Padro, John P <JPadro@goodwinlaw.com>
Cc: Keegan, Timothy <TKeegan@goodwinlaw.com>; DG-GP-SAFE-SSC <DG-GP-SAFE-SSC@goodwinlaw.com>; Taber, Kenneth W. <kenneth.taber@pillsburylaw.com>; Madigan, Sarah M. <sarah.madigan@pillsburylaw.com>
Subject: RE: SecurityScorecard, Inc. v. Safe Securities, Inc., Case No. 1:24-cv-04240-ER

December 24, 2024 – 90 days after SAFE makes its first production of documents in response to SSC's amended document requests on September 25, 2024, as discussed during the August 13 hearing.

Best,

Brian

From: Padro, John P <JPadro@goodwinlaw.com>

Sent: Tuesday, August 20, 2024 7:42 AM

To: Beckerman, Brian L. <brian.beckerman@pillsburylaw.com>

Cc: Keegan, Timothy <TKeegan@goodwinlaw.com>; DG-GP-SAFE-SSC <DG-GP-SAFE-SSC@goodwinlaw.com>; Taber, Kenneth W. <kenneth.taber@pillsburylaw.com>; Madigan, Sarah M. <sarah.madigan@pillsburylaw.com>

Subject: Re: SecurityScorecard, Inc. v. Safe Securities, Inc., Case No. 1:24-cv-04240-ER

Thanks Brian. What did you propose for a deadline to amend the complaint?

We will take these proposals and the draft report to our client and get back to you in the next couple days.

John

On Aug 19, 2024, at 6:32 PM, Beckerman, Brian L.
<brian.beckerman@pillsburylaw.com> wrote:

EXTERNAL

John and Tim,

Thanks again for the call earlier. Please find attached the draft Civil Case Discovery Plan and Scheduling Order, using Judge Ramos' preferred template, memorializing our discussion earlier today. In addition to the deadlines contained herein, we discussed the following:

1. SAFE will provide comments to SSC's draft ESI Protocol and Protective Order by August 26, 2024.
2. The parties will exchange initial disclosures on September 3, 2024.
3. SAFE will complete its document production in response to SSC's amended first set of requests for the production of documents by October 25, 2024 (60 days after SSC serves its amended requests on August 26, 2024).

Regards,

Brian

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[<image11213c.PNG>](#)

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<Proposed Scheduling Order - PWSP DRAFT 8-19-24.pdf>

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